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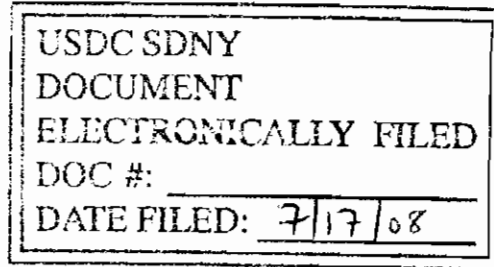
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July 16, 2008

The Honorable Denise Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, New York 10007

MEMO ENDORSED

Re: Trustees of the 1199/SEIU Greater New York Benefit Fund, *et al.* v.
Kingsbridge Heights Rehabilitation Care Center, 07-CV-9744 (DLC)

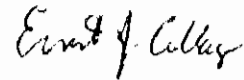
Dear Judge Cote:

We represent Kingsbridge Heights Care Center ("Kingsbridge") in the above-referenced matter. Rule 1.4 of the Local Rules of Civil Procedure provides that an attorney who has appeared as attorney of record may be relieved only by order of the court and may not withdraw from a case without leave of the court granted by order.

I am seeking an order from your Honor for me and my firm to be relieved from representing Kingsbridge in this matter, and I write to obtain your direction as to whether we should submit a formal motion in that regard or whether this letter will suffice. I am prepared to submit an affidavit with respect to our request, pursuant to Local Rule 1.4. I also am seeking your guidance as to whether I should submit the affidavit, and any formal motion you may require, ex-parte or under seal.

Thank you for your attention to this matter.

Sincerely,



Ernest J. Collazo (EC8131)

cc: Helen Sieger

Hanan Kolko, Esq.
Counsel for Plaintiffs

Fact discovery ends on July 25 and any summary judgment motion is due August 5. These dates are firm, as the parties were advised on April 9 and July 1. Counsel's application to withdraw must include evidence that the defendant has been advised of those facts and that those dates will not be altered due to the defendant's change of counsel. Any application must be made on notice, include the defendant's position on the application, and request permission for an ex parte submission that will be restricted only to confidential information.



July 17, 2008